

EXHIBIT F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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CARL G. SIMPSON, et al., *

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Plaintiffs, *

*

Case No.: C-1-00-0014

vs. *

*

INTERMET CORPORATION, et al., *

*

Defendants. *

* * * * *

DEPONENT: ROBERT McMILLAN

DATE: NOVEMBER 16, 2001

TIME: 12:24 P.M. - 2:35 P.M.

LOCATION: AIRPORT HOLIDAY INN
SUITE 218
ROANOKE, VIRGINIA

REPORTED BY: CYNTHIA N. STILES
COURT REPORTER
NOTARY PUBLIC IN AND FOR THE
STATE OF VIRGINIA AT LARGE

1 the position as we see in Exhibits R-2 and R-3, with the
2 cope separated from the gas head in order to remove
3 stickers from the top part of the cope, is it your
4 understanding that for employee, for the operator to
5 attach the cope back to the gas head, he should be able
6 to do that from his operating station?

7 A It's my understanding, yes.

8 Q Again, it would be an undesirable arrangement
9 for the operator to have to leave his control panel to
10 activate a valve to bring the cope back up to the gas
11 head?

12 A Let me clarify one thing. Are you talking
13 about this is a normal part of the production process?

14 Q Normal as in if you include normal part of
15 the production process to include the removal of
16 stickers from the top part of the cope, yes.

17 A I don't think it's a good practice for the
18 operator to be overriding the solenoid. I don't
19 remember that was ever necessary.

20 Q It would be an unsafe condition? Would you
21 agree with that?

22 A It's not necessarily unsafe, but it's not a
23 good practice, and the valve is not designed for that to
24 be done.

25 Q It would be less safe than if the operator

1 screen panel view. It had the controls interface on
2 that screen to allow the operator to do whatever needed
3 to be done with the machine.

4 Q And that panel view is what we see in the
5 right-hand side of R-1?

6 A I believe that is the panel view. But I will
7 reiterate; the hydraulic valve is not something that the
8 operator would ever have any reason to do anything with.

9 Q In fact, it would be an undesirable
10 arrangement, would it not, for the operator to have to
11 leave his operating station, go to the side or rear of
12 the machine to activate a valve to bring the cope back
13 to the gas head? Would you agree with that?

14 A You couldn't run the machine and do that.

15 Q I mean would that be an undesirable condition
16 or arrangement?

17 A It would be, but the machine wouldn't run.
18 The machine is set up for an automatic cycle.

19 Q The same question or same series of questions
20 along that line that we are talking about, as far as the
21 machine being shut down and the removal of stickers.
22 Are you familiar with that process?

23 A Yes, I am.

24 Q Is that process any different than what we've
25 been talking about? If the machine were to be cycled to

1 could bring the cope back to the gas head from his
2 operating station, versus if you were to have to leave
3 that operation station and go back to the side or the
4 rear of the machine? Would you agree with that?

5 A Yes, I would agree with that.

6 Q Photograph R-14 shows an individual's arm
7 reaching back, and R-15 may help you, as far as the
8 location of where that photograph is taken.

9 In R-14 it shows someone's arm pointing back
10 or going back to a location. Is that approximately the
11 location of the solenoid valve that we've been
12 discussing? The hydraulic solenoid valves?

13 A I really can't tell from this picture.

14 Q 14 should be a closeup of the area,
15 approximately right in here where you see the air wand
16 in R-15.

17 A What I do remember is that the machine came
18 with various valves installed on the side of it, and we
19 added this one additional solenoid valve for the strip
20 cylinder, and it was added adjacent to the valves that
21 were already present.

22 Q So --

23 A To look at this picture right here, no, this
24 doesn't look quite like what I remember, but I could be
25 mistaken.